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January 10, 2025

VIA ECF

The Honorable Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Bishop v. Mars Hill University*,
Case No.: 1:24-cv-7225

Dear Judge Broderick,

The undersigned represents Cedric Bishop, on behalf of himself and all other persons similarly situated (“Plaintiff”) in the above referenced matter against Defendant, Mars Hill University, (“Defendant”). The undersigned respectfully requests an additional 30 days to effectuate service. Due to a clerical error, a request for issuance of summons was never filed in this action, we have since changed assistants due to the errors that occurred during the similar time frame which resulted in untimely service and it is understand that it is inexcusable, however we have taken steps to prevent these mistakes in the future. We have since sent this matter out for service and it should be served within the next two weeks. The Defendant received courtesy copies of the Complaint and Summons and would not be prejudiced by this extension. This request will grant ample time for the Defendant to appear and discuss a possible resolution with Plaintiff’s Counsel. This is the Plaintiff’s first request for an extension.

Respectfully submitted,

GOTTLIEB & ASSOCIATES PLLC
/s/Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.